

Appln No. 10/019,148
Amdt date October 14, 2004
Reply to Office action of July 14, 2004

REMARKS/ARGUMENTS

The above amendments and following remarks are made in response to the Office Action of July 14, 2004. Claims 1, 3, 9, and 20 have been amended. Claims 21-24 have been added. No new matter has been added. No claims are currently canceled. Claims 1-15 and 20-24 are currently pending in the application.

On page 2 of the Office action, the Examiner acknowledges the IDS submitted on December 21, 2001. Subsequent IDSs were submitted on June 3, 2002 and October 7, 2004 (copies are enclosed). Applicant respectfully requests that these IDSs be acknowledged by the Examiner.

On pages 2-3 of the Office action, the drawings are objected to because various structural details are allegedly missing from the drawings that are essential for a proper understanding of the disclosed invention. Applicant respectfully traverses these objections. The Examiner alleges that element "A5," "E2," and "A25" are mentioned in claims 1, 11, and 13, respectfully, and are not shown in the drawings. "A5," "E2," and "A25," however, have been previously deleted from claims 1, 11, and 13, and do not appear in any of the further claims, or anywhere in the Substitute Specification. Applicant has amended claim 3 to eliminate the "spring element" and directs the Examiner to FIGs. 2a-2b for a depiction of one embodiment of the spring tensioning arrangement of claim 3. Applicant therefore respectfully requests that the objections to the drawings be withdrawn.

On page 3-5 of the Office Action, claims 1, 2, 4, 5, 8-11, 14, 15, and 20 are rejected as anticipated by Brusasco.

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Applicant has amended claims 1 and 20 to additionally recite that the means (or thermal coupling) is connected to or located in the gear housing, such that the stability of the gear housing is increased. Support for this limitation is in the Substitute Specification, page 5, lines 5-10, page 10, lines 20-25, and FIGs. 1-5. Applicant respectfully submits that Brusasco does not teach or suggest all of the limitations of amended claims 1 and 20.

Namely, Applicant respectfully submits that Brusasco does not teach or suggest that the means are connected to or located in the gear housing such that the stability of the gear housing is increased. In fact, as shown in FIG. 1 and discussed in the Brusasco, the "second portion 120" of the frame 102 (including 121, 122, 123), which the Examiner alleges corresponds to the means in Applicant's claim 1, extends from the bottom 124 of the gear housing (108, 106, 107, 102, 124). Thus, the second portion 120 does not increase the stability of the gear housing, and likely decreases its stability. Applicant therefore respectfully requests that Brusasco does not teach or suggest all of the limitations of claims 1 and 20, and requests that their rejections, along with the rejections of dependent claims 2-15 be withdrawn.

Applicant has added new claim 21, directed to the means physically contacting the power semi-conductor, as shown in FIGs. 1, 1a, 2b, and 3-5. As Brusasco shows the power elements 23, 25, and 27 spaced from the second portion 120, Applicant respectfully requests that this claim be allowed.

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Regarding claim 2, Applicant respectfully submits that Brusasco does not teach or suggest a force-locking engagement between the means (purported to correspond to element 121) and the power semi-conductor housing (purported to correspond to elements 123 and 120). Brusasco clearly states in Col. 3, lines 26-27 that elements 121 are "side walls...of the portion 120," which are shown in FIGs. 1 and 2 as portions of the same single piece. Applicant therefore submits that Brusasco does not teach or suggest that these portions are in force-locking engagement, and therefore requests that the rejection of claim 2 be withdrawn.

Regarding claim 4, Applicant respectfully submits that Brusasco does not teach or suggest that a heat conducting means is mounted for thermal coupling between the means and a power semi-conductor housing. The Examiner states that the means corresponds to element 121 in Brusasco, that the heat conducting means also corresponds to element 121 in Brusasco. As Brusasco therefore does not teach or suggest that element 121 be mounted between *itself* and a power semi-conductor housing, Applicant respectfully requests that the rejection of claim 4 be withdrawn.

Regarding claim 5, Applicant respectfully submits that Brusasco does not teach or suggest an opening for inserting the means and guide elements for positioning the means in an end position, and the means is lockable in the end position. The Examiner has not pointed out and Applicant cannot find in Brusasco any teaching or suggestion of an opening or guide elements for positioning the means. In fact, the element the

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Examiner claims corresponds to the means is a portion of the gear housing 120 that does not appear to be inserted into any opening to be positioned or locked. Applicant therefore requests that the rejection to claim 5 be withdrawn.

Regarding claim 8, Applicant respectfully submits that Brusasco does not teach or suggest a cooling element (purported to correspond to element 123) coupled to the means to discharge waste heat from the power semi-conductor to the cooling element, which is a support plate on which the gear housing is fixed. The Examiner has not pointed out and the Applicant cannot find any teaching or suggestion of a support plate or a cooling element. In fact, element 123 that the Examiner has alleged corresponds to both a cooling element and the support plate, is described in Brusasco as an "end wall," which is not disclosed as either cooling or supporting. Applicant therefore respectfully requests that the rejection to claim 8 be withdrawn.

Regarding claim 9, Applicant respectfully submits that Brusasco does not teach or suggest a fastening element integrated in the heat conductor for fixing the gear housing on the cooling element. As discussed above, no cooling element is discussed in Brusasco. Further, the Examiner has not pointed out and Applicant cannot find any teaching or suggestion in Brusasco of a fastening element to fix the gear housing (purported to correspond to 105) to the cooling element (purported to correspond to element 123). In fact, figures 1 and 2 of Brusasco appear to show 105 and 123 as two portions of the same element that would not require a fastening element for

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fixing together. Accordingly, Applicant respectfully requests that the rejection to claim 9 be withdrawn.

Regarding claim 10, the Examiner has not pointed out and the Applicant cannot find any teaching or suggestion in Brusasco of a bearing (corresponding element in Brusasco not indicated) for a gear element (not indicated) integrated in the means ("121").

Regarding claim 11, the Examiner has not pointed out and the Applicant cannot find any teaching or suggestion in Brusasco of positioning elements (not indicated) in the means ("121") for positioning the control device ("27, 101") relative to a gear element (not indicated) or a magnet (not indicated) on the gear element (not indicated). Applicant therefore requests that the rejection be withdrawn.

Regarding claim 14, Applicant respectfully submits that Brusasco does not teach or suggest conductor panels ("123" is purportedly one conductor panel, another not indicated) that are insulated from each other and arranged on the means ("121") to connect a structural element (not indicated) and an interface (not indicated) of the control device ("27, 101"). Applicant therefore respectfully requests that the rejection to claim 14 be withdrawn.

Regarding claim 15, Applicant respectfully submits that Brusasco does not teach or suggest the conductor panels, contact elements on the conductor panels, or any fitting of the means ("121", in fact, does not appear to be fitted into anything at any point). Applicant therefore requests that the rejection of claim 15 be withdrawn.

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On page 5, claim 3 is rejected as obvious over Brusasco in light of Tharman. Applicant respectfully traverses this rejection. Applicant respectfully submits that, because the "side walls 121 of the portion 120," which the Examiner alleges correspond respectively to the means and the power semiconductor housing, are already portions of the same element, the spring-tensioning of Tharman would not only be impossible to implement between these two elements, but one would have no motivation to create a "locking connection" between two portions of an element that is already in one piece. Applicant therefore requests that the rejection to claim 3 be withdrawn.

On page 6 of the Office Action, claim 6 is rejected as obvious over Brusasco in light of Tharman and Stiepler. Applicant respectfully traverses this rejection. As stated above, Brusasco fails to teach or suggest that the means increases the stability of the gear housing, and the remaining references fail to cure these deficiencies.

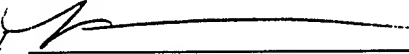
Applicant notes with appreciation that claims 7, 12, and 13 would be allowable if rewritten in independent form. Applicant has added new claims 22-24 which correspond to claims 7, 12, and 13 rewritten in independent form. Applicant therefore requests allowance of claims 22-24. Applicant likewise requests allowance of claims 7, 12, and 13 as dependent from allowable base claim 1.

In view of the foregoing amendments and remarks, it is respectfully submitted that this application is now in condition for allowance, and reconsideration and allowance are therefore respectfully requested. Applicant requests that the Examiner

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call the Applicant's representative at the telephone number below to discuss the instant response, if such an interview would aid in the Examiner's understanding of the distinguishing factors or the efficiency of prosecution.

Respectfully submitted,
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